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1 LOU DeBOTTARI: Lou, D-e, capital, B-o-t-t-a-r-i. I have received the two documents from DOE -- the Supplement to the Draft Environmental Impact Statement, and the executive summary with a CD of a 980 page engineering report. I have not read the entire report yet, but I want more time to comment on it.

2 In the Supplement, summary page S-1, fourth paragraph, third line, higher temperature. Let me go back a second. Both documents are engineering documents and as such should not use adjectives. Either give a band amplitude, etc., not better, larger, greater, etc. That is a lazy way to write a report.

Supplement, in the Summary page S-1 paragraph, third line, higher temperature means that at least a portion. What portion and how much?

3 S-2, paragraph one, DOE intends to control the temperature. The method of control is similar to maintaining a water level in a bathtub with the drain open and the faucet partially open. The drain must continue to have the same restriction. The water pressure must remain constant and the water temperature shall remain the same or the level will not remain constant. This is a simple problem in open control. DOE expects all the parameters affecting temperature source to have the same temperature grading until the site is closed. It's a very optimistic plan.

4 DOE is attempting to address the Draft EIS design. Part of the Draft EIS design is to perform subsystems. This report eliminates the subsystem requirement and tests or simulations and instead depends totally on the total system performance assessment. The subsystem simulations addressed specific requirements that are to be done or to be met. DOE cannot disregard these requirements unless higher authority waives them.

5 Section 2.6, section 2.2.2, sixth line, relative humidity could affect the corrosion rate. By this time in the program DOE should understand this elementary engineering problem, and not say could. I think this is the big red herring in the whole thing. What are you talking about in corrosion rates over greater than 10,000 years?

6 The proposal speaks of 75 years of forced air ventilation to keep the temperature within the design limit. This is page 2-9, last paragraph of section 2.2.2.2.2. How soon after the ceasing of the forced air due to sensing of contaminants in the exhaust pool to the outside air will the temperature rise above the safe limits of the cask, assume the placement to be the closest spacing? This information should be provided in the EIS, not as a backup document. I take issue with this form of engineering variance that will cause a failure and then thus directly emit into the atmosphere.

7 Page 2-9, next to the last sentence, Would occur over a 24-year period except if DOE uses aging. This section of the proposal indicates to me that the blending pool and dry storage is an ideal method to store the material above ground. This could be the ploy of the nuclear industry to circumvent the congressional edict that there should be no above-ground storage at Yucca Mountain. The blending pool and dry storage should not be constructed until the repository construction is complete. This will ensure that no material will be shipped until the entire project has been approved. There should be no simultaneous construction and placement operations.

Page 2-11, last paragraph. If I understand this paragraph correctly, if the thermal low scenario is chosen -- I'll come back later but I want to make one comment then.

8 Nowhere have I found at the time required to remove in the worst case position a waste package that has failed prematurely. This entire EIS assumes that there will be no waste package failing prematurely. I think that's very optimistic. When one includes the worst case when both the forced air fails and the cask fails, what will be the amount of material emitted into the atmosphere? What is the maximum temperature a waste package container can withstand before it releases material? Has the cask been tested to ensure that it can prevent any emitting gases or material if the temperature rose after the fans failing?

9 Nowhere in this report or in the EIS have I found any discussion of the corrosion caused by contact of two dissimilar metals. Is there any possibility of a current flowing through the waste packages? A very low current could cause big problems over periods of time. I was surprised that DOE chose 316 stainless. It's magnetic and corrodes very easily. Has any analysis been conducted on whether the magnetic material can develop a small current?

MR. FLAHERTY: Sir, would you begin to wrap up your comments, please.

10 LOU DeBOTTARI: In closing, the DEIS is nothing more than an attempt by DOE to reduce the amount of questions to the answers by the last DEIS, and more important find a way to begin delivery of high-level waste to the site earlier.

11 There are too many uncertainties. We are to believe computer simulations that predict performance greater than 10,000 years. The majority of the congress and many of the DOE do not believe the simulations about global warming, yet this same group wants us to believe that the same caliber of experts can now predict another unknown for a longer duration.

12 Our computer programs have a difficult time predicting the weather one month into the future. Again DOE wants us to believe that they have all the data to predict performance out past 10,000 years. And to be safe the predictions should go out to one half life of the actinides, that's over a million years. All the problems that DOE is expressing --

MR. FLAHERTY: Sir, I'm going to have to ask you to finish up, please.

LOU DeBOTTARI: One sentence.

13 All the problems that DOE is experiencing is that of the nature varies are not adequate, and thus DOE, because of congress, is attempting to improve on mother nature. This process is doomed to failure. I had a professor who told us that when we think we have beaten mother nature, watch out, she's got you and you don't know it. I believe this fits the position that DOE scientists are in. This is a no-win position. The site selection is defective, and no amount of Band-Aids can fix the problem.